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United States Bankruptcy Court  
Southern District of New York

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In re:

Chapter 11

General Motors Corp., *et al.*,

Case No. 09-50026 (REG)

(Jointly Administered)

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**LIMITED OBJECTION TO THE PROPOSED ASSUMPTION AND  
ASSIGNMENT OF THE ASSUMABLE EXECUTORY CONTRACTS OF  
CHEMICO MAYS, LLC**

Chemico Mays, LLC (“Chemico Mays”) hereby submits this limited objection (the “Objection”) to the Notice of (I) Debtors’ Intent to Assume and Assign Certain Executory Contracts and (II) Cure Costs Related Thereto (the “Notice of Intent”), served upon Comau by the Debtors pursuant to this Court’s Order Pursuant to 11 U.S.C. §§ 105, 363, and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 (III) Approving Procedures for Sale of Debtors’ Assets Pursuant to Master Sale and Purchase Agreement With Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser; (IV) Scheduling Bid Deadline and Sale Hearing Date; (III) Establishing Assumption and Assignment Procedures; and (V) Fixing Notice Procedures and Approving Form of Notice (the “Bidding Procedures Order”), stating as follows:

1. The Debtors commenced their voluntary Chapter 11 bankruptcy cases on June 1, 2009.

2. On June 2, 2009, this Court entered the Bidding Procedures Order, which includes procedures regarding Debtors' assumption and assignment of executory contracts.

3. Pursuant to the Bidding Procedures Order, the Debtors delivered a Notice of Intent to Chemico Mays indicating that the Debtors intend to assume and assign some or all of the Debtors' contracts (the "Assumed Contracts").

4. Chemico Mays files this limited objection to the Cure Amount set forth in the Notice, as Debtors records indicate that the amount necessary to cure defaults is \$605,058.00.

**WHEREFORE**, Chemico Mays requests that the Court: (i) determine the appropriate Cure Amount; and (ii) grant such other and further relief as is just and appropriate.

Dated: June 15, 2009.

Respectfully Submitted

MCDONALD HOPKINS PLC

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